

West Lake Landfill site, Bridgeton Missouri CERCLA History

- National Priority Listing (NPL) for West Lake
 - West Lake Landfill was listed on the NPL in 1990 (See 55 FR 35502-25512, Aug. 30, 1990).
 - The NPL listing package limited the analysis to radioactively contaminated materials.
 - NPL listings are based on data of a sufficient nature to list the site but are not inclusive of all contaminants that may present an unacceptable risk and do not define the areal of extent of contamination.
 - As noted in a 2012 HRS listing: *The HRS does not require scoring all pathways if scoring those pathways does not change the listing decision. The HRS is a screening model that uses limited resources to determine whether a site should be placed on the NPL for evaluation and possible Superfund response. A subsequent stage of the Superfund process, the remedial investigation (RI), characterizes conditions and hazards at the site more comprehensively.*
- For West Lake site, Operable Unit (OU) 1 deals with the radiation contamination, and OU2 deals with the non-radiation contamination.
- The ROD for OU2 (non-radiation) states: “For areas operated under state permit, i.e., the Former Active Sanitary Landfill and the Closed Demolition Landfill, the terms of their respective permits dictate the appropriate closure and post-closure care requirements. Successful completion of these requirements would eliminate the need for further CERCLA action at these units. Consistent with EPA's policy on coordination between the Resource Conservation and Recovery Act and CERCLA actions, these regulated units are deferred to the state regulatory program.”
- Most of the activities and issues related to the Bridgeton Landfill have been managed by the State, which is consistent with the deferral language in the OU2 ROD. This includes management of the off-gassing, which has been an issue of significant community interest.
- Although the State is managing this portion of the site (Bridgeton Landfill), EPA has considered that this portion was part of the CERCLA site.
- In addition, OU1 (radiation) also had a ROD signed in 2008, although the Agency is pursuing a ROD amendment to the remedy selected in that ROD. That has been the primary focus of work over the last few years, including the NRRB consultation and ongoing work supported by OSRTI, ORD, and others.
- OU2 (non-radiation) had a separate ROD signed in 2008 for the non-radiations portions of the site and does not include the Bridgeton Landfill. This portion included the closed demolition landfill, the inactive sanitary landfill, and the former active sanitary landfill. These were not operating portions of the landfill and therefore not under a Missouri permit.
- The following maps are attached (please note the “North” arrows as the orientation can vary from one map to the next):
 - West Lake Landfill OU-2 map
 - Shows the the overall boundaries and state permit coverages

- West Lake Site Layout for OU-1, which shows Radiological Areas 1 and 2
 - West Lake Site vicinity map
- There also has been some recent discussion regarding a possible recent flyover that might have indicated some hot spots near and around the area of radiation contamination. However, subsequent discussions within EPA and with the State have indicated that that information does not seem credible, and it appears it is no longer being addressed by the Region or by the State.